

EXHIBIT 1

Stipulation

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
)	
YELLOW CORPORATION, <i>et al.</i> , ¹)	Case No. 23-11069 (CTG)
)	
Debtors.)	(Jointly Administered)
)	

**STIPULATION REGARDING
TEMPORARY ALLOWANCE OF CLAIMS OF THE PENSION FUNDS
FOR VOTING PURPOSES PURSUANT TO BANKRUPTCY RULE 3018(a)**

On this third day of February, 2025, the above-captioned debtors and debtors in possession (collectively, the “Debtors”), the Western Pennsylvania Teamsters and Employers Pension Fund (the “Western PA Fund”), and the International Association of Motor City Machinists Pension Fund (the “IAM Fund,” together with the Western PA Fund, the “Pension Funds,” and collectively with the Debtors, the “Parties”), hereby submit this Stipulation (the “Stipulation”), and in support thereof, respectfully state as follows:

WHEREAS, on August 6, 2023 (the “Petition Date”), the above-captioned debtors (collectively, the “Debtors”) filed voluntary petitions for relief under Chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”).

WHEREAS, following the Petition Date, each Pension Fund filed one or more claims for withdrawal liability (the “Withdrawal Liability Claims”)² based on the regulations implemented

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of the Debtors' principal place of business and the Debtors' service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

² The Western PA Fund filed Proofs of Claim Nos. 18200, 18217, 18230, 18244, 18257, 18267, 18282, 18292, 18307, 18318, 18329, 18339, 18348, 18358, 18369, 18378, 18389, 18397, 18410, 18416, 18422, 18430, 18438, and 18442. The IAM Fund filed Proofs of Claim Nos. 16895 and 16905.

by the Pension Benefit Guaranty Corporation (“PBGC”) for treatment of special financial assistance (“SFA”) in the calculation of withdrawal liability obligations.

WHEREAS, pursuant to the Solicitation and Voting Procedures attached as Exhibit 1 to the *Order Approving (I) the Adequacy of the Disclosure Statement, (II) the Solicitation and Voting Procedures, (III) the Forms of Ballot and Notices in Connection Therewith, and (IV) Certain Dates with Respect Thereto* [Docket No. 5024], the Debtors are authorized to enter into stipulations with the Holder of any Claim agreeing to the amount of a Claim for voting purposes.

NOW THEREFORE, in consideration of the foregoing, the Parties hereby stipulate and agree (this “Stipulation”) as follows, which such Stipulation shall be effective upon approval by order of the Bankruptcy Court (the “Order”):

1. The Western PA Fund shall have a temporarily allowed General Unsecured Claim (as defined in the Plan) in the amount \$132,571,796 solely for the purposes of voting on the Plan and the IAM Fund shall have a temporarily allowed General Unsecured Claim in the amount \$10,512,500 solely for the purposes of voting on the Plan (the “General Unsecured Claim Amounts”).

2. For the avoidance of doubt, nothing contained in this Stipulation is intended or should be construed as: (a) an admission as to the validity or amount of any particular claim against a Debtor entity; (b) a waiver of the Debtors’ rights to dispute any particular claim on any grounds; (c) a promise or requirement to pay any particular claim; or (d) a waiver or limitation of the Debtors’ rights under the Bankruptcy Code or any other applicable law.

3. This Stipulation constitutes the entire agreement and supersedes all other prior agreements and understandings, both written and oral, between the Parties with respect to the

subject matter hereof and, except as otherwise expressly provided herein, are not intended to confer upon any other person any rights or remedies hereunder.

4. Each Party has participated in and jointly consented to the drafting of this Stipulation and agrees that any claimed ambiguity shall not be construed for or against either Party on account of such drafting.

5. The Court shall retain jurisdiction over any and all disputes or other matters arising under or otherwise relating to this Stipulation.

Dated: February 3, 2025
Wilmington, Delaware

/s/ Laura Davis Jones

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